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Superfund Division

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August 4, 2010

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U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF REGIONAL ADMINISTRATOR

Ms. Susan Hedman
Regional Administrator
U.S. EPA-Region 5
77 West Jackson Blvd.
R-19J
Chicago, IL 60604-3507

EPA Region 5 Records Ctr.



383617

RE: Allied Paper OU-1 Closure Plan

Dear Ms. Hedman:

Congratulations on being recently appointed the EPA Region V Administrator. The City of Kalamazoo (City) would like to take this opportunity to apprise you of the City's involvement with respect to the above-captioned project. The City has been thoroughly involved in the Superfund process for the Allied Paper Site (Operating Unit 1 or "OU-1") since the U.S. Environmental Protection Agency (EPA) and the State of Michigan announced in March 2007 plans to dispose of PCB contaminated sediments from the Kalamazoo River, (OU-5), into the Allied Paper Site. The OU-1 site is located within a Michigan Department of Natural Resources and Environment approved Wellhead Protection Area 5-Year Capture Zone for a group of wellfields that contribute up to 40 percent of the City's Public Water Supply System that serve over 123,000 customers. In addition, the site is surrounded by three established City neighborhoods. A number of environmental and neighborhood organizations, in collaboration with the City, were successful in their efforts to redirect the contaminated sediment to licensed landfills instead of OU-1.

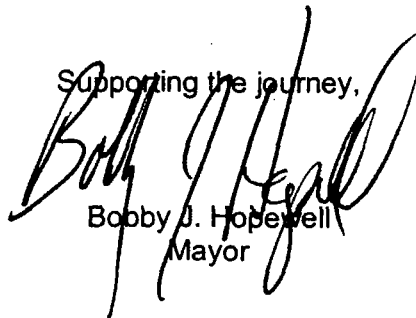
The City also expressed its concerns with the inadequacy of the 2007 Draft Remedial Investigation Report (RI) for the Allied Paper Site, especially as it pertained to the lack of efficient hydrogeologic data, lack of discussion regarding wellhead protection/contaminant fate transport, and its numerous technical inadequacies and inconsistencies. Unfortunately, the RI Report was accepted and approved by EPA Region V and the final document was issued in March 2008. To address our concerns, the EPA requested that a groundwater evaluation study be performed by the PRP's consultant. In the City's opinion, that study was severely limited in scope and failed to adequately address concerns regarding whether contamination at the site could migrate off-site and into the regional groundwater aquifer system. The City, private organizations, general citizens, and State Senators and Representatives have extensively documented their concerns in numerous written reports, e-mails, other correspondence, and verbally at public and other meetings.

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Consequently, we are now in the Feasibility Study (FS) phase of the Superfund process with an inadequate hydrogeologic characterization and knowledge regarding existing contaminants and potential for off site migration. As a result City staff and our consultant have concluded that the remediation alternatives presented in the FS document, with the exception of complete removal, are flawed. The City, with the goal that an appropriate clean-up remedy be selected, has recently submitted two additional remediation alternatives for consideration in the ongoing draft FS: the "Containment Option" and "Containment & Stabilization Option," dated May 5, 2010 and June 30, 2010, respectively. These alternatives provide greater pollutant control of the site's surficial groundwater for containment and off site treatment by creating a vertical boundary preventing offsite contaminant migration. The second alternative takes one step further by immobilizing the contaminated material. Short of total waste removal from the site, these alternatives will provide additional safeguards to what was proposed in the draft FS to help ensure that the migration of contaminants from the OU-1 site be prevented. In essence, the City believes that these two alternatives are more innovative and protective of public health and the environment that what has been proposed to date. Given the City's level of concern and allocation of resources, we would like to see these two additional remedial alternatives considered further in the FS.

Thank you for taking the time to read this letter and consideration of our perspective. We look forward to working together so that an appropriate long-term cost-effective remedy can be selected to be both protective of human health and the environment.

Supporting the journey,

A large, stylized handwritten signature in black ink, appearing to read "Bobby J. Hopewell".

Bobby J. Hopewell
Mayor